

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CACEIS BANK LUXEMBOURG and CACEIS  
BANK,

Defendants.

Adv. Pro. No. 11-02758 (BRL)

**STIPULATION FOR EXTENSION OF TIME**

On June 16, 2014, Caceis Bank Luxembourg and Caceis Bank France, formerly known as Caceis Bank (collectively, “Caceis” or the “Defendants”) filed a motion to dismiss the Complaint (the “Motion”) in the above-captioned adversary proceeding (Adv. Pro. No. 11-02758 (BRL)) (the “Adversary Proceeding”). The Trustee has requested an extension of time to respond to the Motion or to file an amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that:

Caceis does not recognize that the Trustee has the right to amend the Complaint as a matter of course nor does Caceis consent to such an amendment. The Trustee, however, asserts that he has a right to amend the Complaint as a matter of course. To the extent the Trustee seeks to amend the Complaint, any such amendment shall be filed and served on the undersigned counsel to the Defendants on or before August 11, 2014. Caceis shall file and serve on the undersigned counsel to the Trustee any response or make any motion with respect to such amendment on or before September 29, 2014.

If the Trustee objects to the Motion, he shall file and serve on the undersigned counsel to the Defendants any such objection on or before August 11, 2014. Caceis shall file and serve on the undersigned counsel to the Trustee any reply papers on or before August 28, 2014. The September 11, 2014 hearing date would not change.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses , including, without limitation, any right to a jury trial.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: July 3, 2014

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

KELLEY DRYE & WARREN LLP

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*Attorneys for the Defendants*

**SO ORDERED:**

Dated: July 8<sup>th</sup>, 2014

/s/ STUART M. BERNSTEIN  
Honorable Stuart M. Bernstein  
United States Bankruptcy Judge